

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**IN RE:**

Ramona Nichols,

DEBTOR.

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CHAPTER 13  
CASE NO. 21-40725  
JUDGE GRETCHKO

**TRUSTEE’S AMENDED OBJECTIONS TO  
CONFIRMATION OF CHAPTER 13 PLAN**

**NOW COMES** the Chapter 13 Standing Trustee, David Wm. Ruskin, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to Local Bankruptcy Rule 3015-3(a) as follows:

1. The Plan does not comply with 11 USC Section 1308(a). The Department of the Treasury - Internal Revenue Service has filed a Proof of Claim indicating that Debtor has not filed tax returns for 2017 and 2018.
2. The Plan does not comply with 11 USC Section 1308(a). The State of Michigan – Department of the Treasury has filed a Proof of Claim indicating that Debtor has not filed tax returns for 2017, 2018 and 2020.
3. Debtor testified at the First Meeting of Creditors that Debtor is divorced. Debtor has not provided to the Trustee a copy of the Judgment of Divorce without which the Plan may not comply with 11 USC Section 1322 and 11 USC Section 1325.

**WHEREFORE**, the Chapter 13 Standing Trustee requests this Honorable Court deny confirmation of the Plan unless modified to meet these objections or, in the Court's discretion, dismiss the Chapter 13 Case pursuant to 11 USC Section 1307(c).

OFFICE OF DAVID WM. RUSKIN,  
STANDING CHAPTER 13 TRUSTEE

Dated: June 17, 2021

By: /s/ Thomas D. DeCarlo  
DAVID Wm. RUSKIN (P26803)  
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**CERTIFICATE OF SERVICE OF TRUSTEE'S AMENDED OBJECTIONS TO  
CONFIRMATION OF CHAPTER 13 PLAN**

I hereby certify that on June 17, 2021, I electronically filed the Trustee's Amended Objections to Confirmation of Chapter 13 Plan with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

The following parties were served electronically:

UPRIGHT LAW PLLC  
29777 TELEGRAPH RD SUITE 2440  
SOUTHFIELD, MI 48034-0000

The following parties were served via First Class Mail at the addresses below by depositing same in a United States Postal Box with the lawful amount of postage affixed thereto:

Ramona Nichols  
3931 Farnum St  
Inkster, MI 48141-0000

/s/ Vanessa Wild

Vanessa Wild  
For the Office of David Wm. Ruskin  
Chapter 13 Standing Trustee - Detroit  
1100 Travelers Tower  
26555 Evergreen Road  
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